

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re CHINA NORTH EAST PETROLEUM HOLDINGS)	ECF Case
LIMITED SECURITIES LITIGATION)	
)	10-cv-04577-MGC
THIS DOCUMENT RELATES TO:)	
ALL ACTIONS)	NOTICE OF MOTION
_____	X	

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Katherine H. Worden, the exhibits attached thereto, and all prior pleadings in this action, defendant Robert C. Bruce hereby moves, pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6) and the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4, to dismiss the Consolidated Class Action Complaint. Pursuant to Judge Cedarbaum's Individual Rules of Practice, this motion is returnable for oral argument at 10:00 a.m. on Thursday, April 14, 2011.

Dated: March 22, 2010

DEBEVOISE & PLIMPTON LLP

By:

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